

MEMORANDUM



To: Jere Johnson, EPA Region IX
Work Assignment Manager

From: William E. Ritthaler, URS Consultants, Inc. *WR*

Subject: Completed Work

cc: Jeri Simmons, EPA Region IX Contract Officer
Travis Cain, EPA Region IX Project Officer

Attached is the following completed:

PA: ☒ PA Review: ☐ SI: ☐ ESI: ☐ SIRE: ☐

Other: _____

Site Name: Oakland Housing Authority

Latitude: 37° 47' 20" N

Longitude: 122° 13' 35" W

EPA ID#: CA7860090045

City, County: Oakland, Alameda

State Recommendation:

(for reviews only)

For EPA Use Only

EPA Further Action Determination: NFA

Lead Agency: F

Sign-off Date: 6.21.94

Initials of Site Assessment Manager: h

Document Screening Coordinator: _____

Chief, Site Evaluation and Grants Section: _____

Purpose: CERCLA Preliminary Assessment

EPA FINAL REPORT

Site: Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Alameda

Site EPA ID Number: CA7860090045

URS Investigators: Des Garner

Date of Inspection: March 3, 1994

Report Prepared By: Des Garner

Report Reviewed By: Chris Nelson

Review/Concurrence: William E. Rothman

Report Date: April 1, 1994

Document Control No.: 62311.22.33.654 05.a.1

Submitted To: Jere Johnson
EPA Region IX
Work Assignment Manager

1.0 Introduction

The U.S. Environmental Protection Agency (EPA), Region IX, under authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA) has tasked URS Consultants, Inc. to conduct a Preliminary Assessment (PA) of the Oakland Housing Authority site, located at 1180 25th Avenue, Oakland, Alameda County, California.

The purpose of the PA is to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment and to determine if further investigation under CERCLA/SARA is warranted. The scope of the PA includes the review of information available from federal, state, and local agencies, and performance of an on-site reconnaissance visit.

Using these sources of information, the site is then evaluated using EPA's Hazard Ranking System (HRS) criteria to assess the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on EPA's National Priorities List (NPL). The NPL identifies sites at which EPA may conduct remedial response actions. This report summarizes URS' findings of these preliminary investigative activities.

The Oakland Housing Authority site was listed in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on May 1, 1988, as a result of a Notification of Hazardous Waste Activity filed on April 16, 1981. In addition, the facility is also listed on the Federal Docket as of September 30, 1991. This appears to be an erroneous listing, since URS research indicates that the facility is not a federal facility, as discussed further in Section 2.4 (1,2,3,4).

1.1 Apparent Problem

The Oakland Housing Authority facility filed a notification of Hazardous Waste Activity in 1981. This notification was subsequently traced to the disposal of three 55-gallon drums of malathion. The origin of these drums is unknown. Current waste generation at the site is limited to used paint thinner and waste motor oil (1).

2.0 Site Description

2.1 Site Location

The site is located at 1180 25th Avenue, Oakland, in an industrial/residential neighborhood. The Latitude of the site is 37° 47' 20" N; Longitude 122° 13' 35" W; Township 2S, Range 3W, Section 19 (see Figure 1, Site Location Map). The site is bordered to the west by Southern Pacific Railroad tracks, and to the east by East 12th Street. Elevated Bay Area Rapid Transit tracks run parallel to East 12th Street, and Alameda Harbor is located approximately 0.4 miles to the west of the site (1,12).



URS Consultants
 100 California Street
 San Francisco, CA 94111
 March 22, 1994

Site Location Map
 Oakland Housing Authority
 1180 25th Avenue
 Oakland, California

FIGURE

1

2.2 Site Description

The facility consists of one rectangular building, approximately 25,000 square feet in size, with an adjacent fenced yard to the west (see Figure 2, Facility Map). The building houses offices, workshops (plumbing, glazing, and carpentry), a storage area for equipment and paint, and a large parking area for maintenance vehicles. Approximately 125 people report for work at the facility; a little over half of the workers load equipment onto trucks and depart for work at the various public housing facilities operated by the Authority. This work consists of tending the grounds, painting buildings, and performing general maintenance. Approximately 48 people work at the facility itself, including the purchasing department, the modernization department, security, and carpentry.

Wastestreams generated at the site are limited to waste oil from the grounds keepers' lawnmowers and waste paint thinner/lacquer from house painting operations. These wastestreams are stored in 55-gallon drums on pallets in the fenced, paved yard to the south of the building. At the time of the URS visit there was one 55-gallon drum of waste oil and one and a half 55-gallon drums of paint thinner. There is no secondary containment for these drums (1).

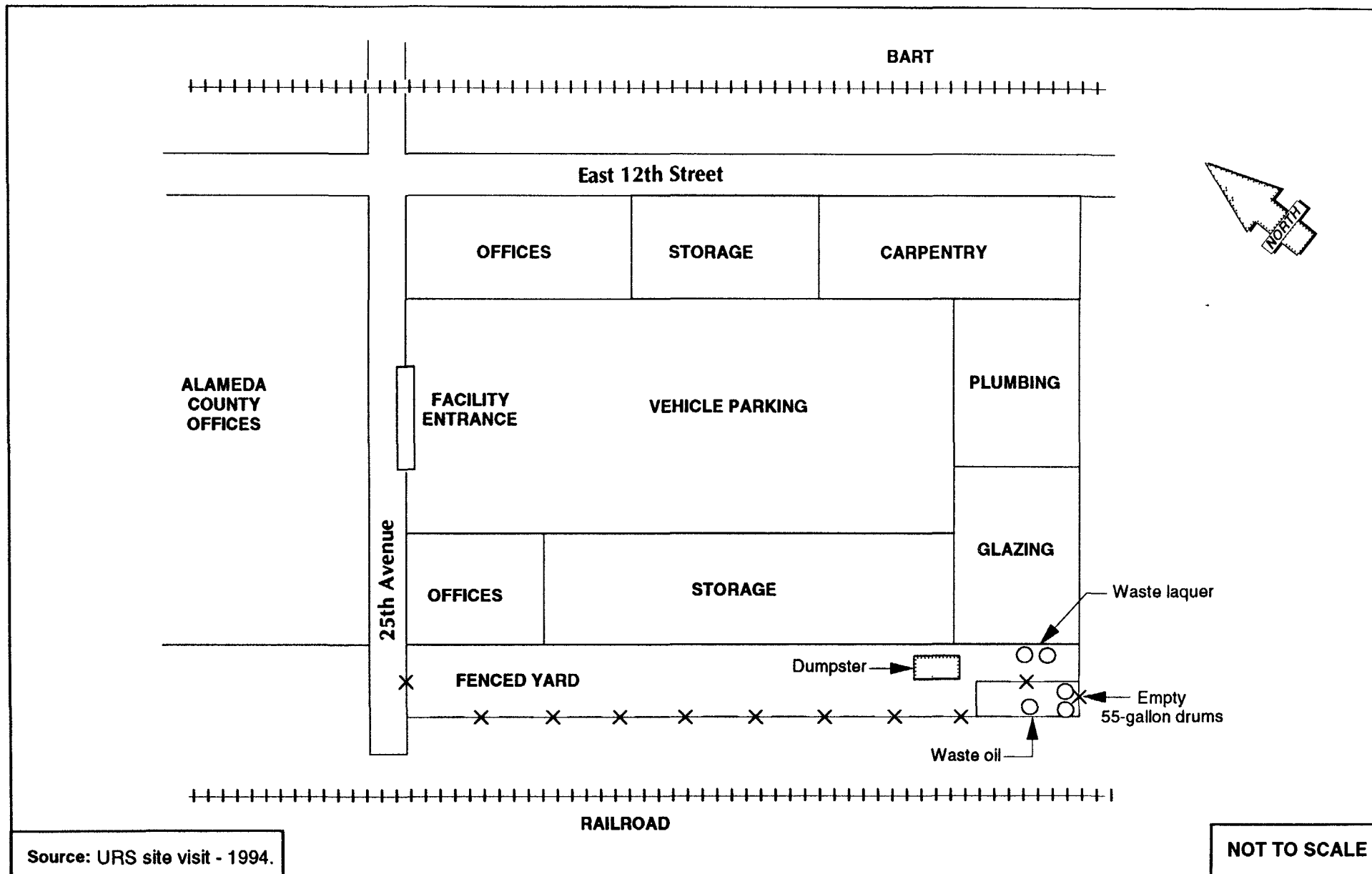
2.3 Operational History

The Oakland Housing Authority facility has been located at this site since 1972, and serves as a base for maintenance operations, purchasing, and the modernization department. Fabrication and repair work are conducted on-site at the plumbing, carpentry, and glazing work shops. This work generates no hazardous waste. Painters, maintenance workers, and grounds keepers leave the facility daily to work on public housing units throughout the city. Upon returning, waste paint thinner is bulked in a 55-gallon drum in the fenced yard to the west of the building. During 1993 a total of seven 55-gallon drums of spent paint thinner were generated and shipped in two batches to Romic Environmental Technologies, Inc. (EPA ID # CAD009452657), Palo Alto, California for disposal.

Waste oil is generated from servicing the lawn mowers used for grounds keeping. Approximately one 55-gallon drum of waste oil is generated per year, and is sent to Evergreen Environmental Services, Inc. (CAD980887418), Newark, California, for recycling. All vehicle maintenance is conducted under contract, off-site (1).

The facility was listed in CERCLIS on May 1, 1988 as a result of a Notification of Hazardous Waste Activity filed in April 1981 (1). This notification was subsequently traced to the disposal of three drums of malathion, which were shipped to the Chemical Waste Management facility at Kettleman Hills (1). There is no record of the origin of these drums, which are therefore thought either to have been abandoned on Oakland Housing Authority property, or to have been surplus stock. Currently, no pesticides or herbicides are used at the site (1).

During renovation work at the public housing units, asbestos waste and polychlorinated biphenyl (PCB) transformers are occasionally removed from facilities. These are manifested and disposed of directly from the site of origin, under site-specific EPA generator numbers (1). None of this material passes through or is stored at the 25th Avenue facility. There are no above ground or underground fuel storage tanks at the facility; all vehicle fueling is conducted off-site (1,8).



URS Consultants
 100 California Street
 San Francisco, CA 94111
 March 8, 1994

Facility Map
 Oakland Housing Authority
 1180-25th Avenue
 Oakland, California

FIGURE

2

2.4 Regulatory Involvement

U.S. Environmental Protection Agency

The Oakland Housing Authority site is not listed in the Resource Conservation and Recovery Information System (RCRIS) database as of 02/22/94. The site was listed on the Federal Docket on 09/30/91. However, URS believes that this listing is in error, because although the Oakland Housing Authority receives funding from the Department of Housing and Urban Development (HUD), the Authority is a public corporate body, and is not owned or operated by HUD (1,2,3,4). In addition, there are four other California Housing Authorities, all of which receive funding from HUD, but are classified as non-federal facilities. These are:

City of Los Angeles Housing Authority:	CAD981441876
County of San Mateo Housing Authority:	CAD038120382
Kings County Housing Authority:	CAD983656893
Monterey County Housing Authority:	CAD981986185

Therefore, based on conversations with personnel at the Oakland Housing Authority and the Department of Housing and Urban Development, and upon the status of the other HUD funded housing authorities cited above, URS concludes that the Oakland Housing Authority is not a federal facility, and should be removed from the Federal Docket (1,2,3,4).

In addition, there is some ambiguity concerning the EPA generator number for the site. The Oakland Housing Authority manifests all wastes generated at this site under the generator number CAC000638128, and not the generator number under which the site is listed on CERCLIS and the Federal Docket (CA7860090045). The CAC generator number is not listed on CERCLIS, RCRIS, or the Docket, and does not appear to be a valid generator number. The last documented use of the CA7860090045 number for waste disposal is during 1986; all subsequent shipments have been made under CAC000638128 (1). It is possible that the CAC number could be an erroneous transcription of a provisional EPA generator number, since these numbers commenced with CAP. However, such provisional generator numbers are strictly single use numbers and thus would not be valid for ongoing waste generation.

Other waste generated during building refurbishment has been manifested from the Oakland Housing Authority facility at 1619 Harrison Street under the EPA generator number CAC981388952. Again, no record of this number can be found in CERCLIS or RCRIS.

California Regional Water Quality Control Board (RWQCB)

The CA RWQCB is not involved with this site (7).

California Environmental Protection Agency Department of Toxic Substances Control (Cal EPA DTSC)

The Oakland Housing Authority site is not on the Cal EPA Bond Expenditure Plan, or the Site Mitigation Annual Workplan (5). The files retrieved by URS included a Surveillance and Compliance Report dated April 12, 1983, which concluded that "no hazardous wastes have been generated or shifted since 1981, when some excess pesticides were disposed

of " (6). The report also stated that "no hazardous wastes are generated as part of any ongoing process or procedure" (6). There is no current Cal EPA DTSC activity at the site; no sampling has been conducted (5).

Alameda County Health Department

Alameda County Health Department (ACHD) is not involved with this site. ACHD confirmed that it had no record of any underground storage tanks at this site (8,9).

3.0 Hazard Ranking System Factors

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). URS has evaluated the following HRS factors relative to this site.

3.1 Sources of Contamination

URS identified two sources of contamination at the Oakland Housing Authority site: waste oil and waste paint thinners. During the URS site visit one 55-gallon drum of waste oil and one and a half 55-gallon drums of waste paint thinners were identified. No analytical results were available on either wastestream; the waste paint thinner is manifested as "Waste Paint Related Material, 3, UN1263, II (Lacquer Thinner, Ethanol, Methanol, n-Butyl Acetate, Toluene, Xylene, Acetone), and the waste oil as "waste oil" (1).

The total quantity of waste paint thinners generated in 1993 was seven 55-gallon drums; one 55-gallon drum of waste oil was generated.

There was no evidence of any spills or stained soil during the URS site visit conducted on March 3, 1994. However, there was no secondary containment for the 55-gallon drums stored in the fenced, paved yard (1).

3.2 Groundwater Pathway

3.2.1 Hydrogeologic Setting

Groundwater in the city of Oakland is not used for drinking water supply (10). The net annual precipitation is 7.74 inches (11).

3.2.2 Groundwater Targets

East Bay Municipal Utility District (EBMUD) supplies the city of Oakland with drinking water from the Mokelumne River in the Sierra Nevada Mountains. EBMUD uses no groundwater or surface water for its drinking water supply, and therefore there are no groundwater targets (10).

3.2.3 Groundwater Conclusions

Groundwater within a 4-mile radius of the site is not used for drinking water (10). There has been no observed release of contaminants either to soil or groundwater (1). (An observed release has occurred when the chemical analysis of an environmental sample from the site is found to be three or more times above the background concentration, and some portion of the release is attributable to the site.)

3.3 Surface Water Pathway

3.3.1 Hydrologic Setting

The Oakland Housing Authority site is located in an industrial/residential area, 0.4 miles east of Alameda Harbor, at an elevation of approximately 40 feet (12). The site is not located in a 100-year or 500-year flood plain (13). Surface drainage is toward the southwest; however, any surface release of waste oil or paint thinner would dissipate in the Southern Pacific railroad track beds adjacent to the fenced storage yard (1). Therefore, there is no potential for a surface release to reach the Alameda Harbor. The 2-year, 24-hour precipitation is 3.5 inches (14).

3.3.2 Surface Water Targets

There are no surface water drinking water intakes in the city of Oakland (10). There are no surface waterways available to spilled drummed material from the facility (1,12).

3.3.3 Surface Water Conclusions

There is no potential for surface runoff of spilled paint thinner or oil at the site to reach a surface waterway (1,12).

3.4 Soil Exposure and Air Pathways

3.4.1 Physical Conditions

The drummed waste is stored in a securely fenced, paved yard, adjacent to the facility building (3). There is no evidence of any spillage in the yard (3).

3.4.2 Soil and Air Targets

Approximately 125 people report for work at the facility. About half of the workers then depart to work at other off-site public housing facilities. About 48 people work at the facility itself. The population within 4 miles of the site is 452,257 (3,15). The waste storage area is not accessible to the general public (3). The site is located in a residential/industrial area (3).

3.4.3 Soil and Air Conclusions

There is no contaminated soil to present any threat to workers or nearby resident exposure (3).

4.0 Emergency Response Considerations

The National Contingency Plan [40 CFR 300.415 (b) (2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment. For the following reasons emergency actions do not appear to be necessary for this site:

- The limited quantities of waste oil and paint thinner stored on-site are located in a secured, fenced area, and present no danger to the local population or environment.

5.0 Summary

The Oakland Housing Authority facility is located at 1180 25th Avenue, Oakland, California. The facility consists of an approximately 25,000-square-foot office and maintenance facility within a single building, and an adjacent fenced storage yard. The facility is located in an industrial/residential neighborhood, approximately 0.4 miles from the Alameda Harbor. The site is bounded to the west by Southern Pacific railroad tracks. The facility has been located at this site since 1972.

Approximately 48 people work at the facility itself, including administrative and maintenance staff. An additional 75 people report for work at the facility but work off-site at various public housing facilities throughout the city. Plumbing, glazing, and carpentry fabrication are conducted on-site; building supplies are stored at the facility.

House painting crews return to the facility with waste paint thinner/lacquer, which is bulked in 55-gallon drums and stored in the fenced yard adjoining the building. The maximum quantity of waste paint thinner on-site at any time is three 55-gallon drums; there is no secondary containment for this drummed material. In addition, one 55-gallon drum of waste oil is generated from routine maintenance of the lawn mowers used by the grounds keepers. Waste oil is recycled by Evergreen Environmental Services, Inc. of Palo Alto, California. Waste paint thinner/lacquer is disposed of at the Romic Environmental Technologies, Inc. facility in Newark, California.

The following are the Hazard Ranking System factors pertinent to this site:

- Groundwater is not used for drinking within 4 miles of the site.
- Small quantities (one to three 55-gallon drums) of waste paint thinner and oil are stored in a fenced, paved yard, without secondary containment.
- There is no potential for overland migration to surface water.

References

1. Levy, Jim, Materials Manager, Oakland Housing Authority, and D. Garner, URS Consultants, Inc., Site Reconnaissance Interview, March 3, 1994.
2. Mattessich, Rick, Department of Housing and Urban Development, and D. Garner, URS Consultants, Inc., telephone conversation, January 14, 1994.
3. Moore, Leroy, Oakland Housing Authority, and D. Garner, URS Consultants, Inc., telephone conversation, January 27 1994.
4. Joda, Robert, Market Analyst, Department of Housing and Urban Development, and D. Garner, URS Consultants, Inc., telephone conversation, March 21 1994.
5. Nepomuceno, Cris, California Environmental Protection Agency, and D. Garner, URS Consultants, Inc., telephone conversation, January 14, 1994.
6. Aknone, W.J., California Department of Health Services, *Surveillance and Compliance Report*, City of Oakland Housing Authority, April 12, 1983.
7. Sterling-Cahee, Monica, California Regional Water Quality Control Board, and D. Garner, URS Consultants, Inc., telephone conversation, January 14, 1994.
8. Chan, Barney, Alameda County Environmental Health, and D. Garner, URS Consultants, Inc., telephone conversation, January 20, 1994.
9. Meregillano, Roel, Alameda County Environmental Health, and D. Garner, URS Consultants, Inc., telephone conversation, March 1, 1994.
10. Bowen, Russ, East Bay Municipal Utility District, and C. Weinstein, URS Consultants, Inc., telephone conversation, March 8, 1994.
11. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Environmental Satellite Data & Information Service, National Climatic Data Center, Comparative Climatic Data for the United States through 1985, Nashville, TN.
12. U.S. Geological Survey 7.5-minute Topographic Map, Oakland East Quadrangle, photorevised 1979.
13. Firth, Bill, U.S. Army Corps of Engineers, and S. Won, URS Consultants, Inc., telephone conversation, June 5, 1992.
14. U.S. Department of Commerce, NOAA, National Weather Service, NOAA Atlas II, Precipitation-Frequency Atlas of the Western United States, Volume XI-California, p.37, Silver Spring, Maryland, 1973.
15. U.S. Environmental Protection Agency, Geographic Information Service, printout for Oakland Housing Authority, November 17, 1993.

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Oakland Housing Authority

EPA ID #: CA7860090045

Alias Site Names:

City: Oakland

County or Parish: Alameda County

State: CA

Refer to Report Dated: April 1, 1994

Report Type: Preliminary Assessment

Report developed by: URS Consultants, Inc.

DECISION:

☒ 1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

☒ 1a. Site does not qualify for further remedial site assessment under CERCLA (Site Evaluation Accomplished - SEA)

☐ 1b. Site may qualify for further action, but is deferred to: ☐ RCRA ☐ NRC

☐ 2. Further Assessment Needed Under CERCLA

2a. (optional) Priority: ☐ Higher ☐ Lower

2b. Activity ☐ PA ☐ ESI
Type ☐ SI ☐ HRS evaluation

☐ Other _____

DISCUSSION/RATIONALE:

Very small quantities of waste.

No evidence of release.

Report Reviewed
and Approved by:

J. Johnson

Signature:

J. Johnson

Date:

6.21.94

Site Decision
Made by:

J. Johnson

Signature:

J. Johnson

Date:

6.21.94

Appendix A
Contact Log and Reports

Contact Log

Facility Name: Oakland Housing Authority

Facility ID#: CA7860090045

Contact	Affiliation	Phone #	Date	Information
Bill Firth	U.S. Army Corps of Engineers	(415) 774-3029	06/05/92	The 100-year flood plain in Oakland corresponds to an elevation of 6.8 feet above sea level; the 500-year flood plain corresponds to an elevation of 7.0 feet above sea level.
Rick Mattessich	Department of Housing and Urban Development (HUD)	(415) 556-3713	01/14/94	See Contact Report.
File Clerk	Alameda County Assessors Office	(510) 272-3787	01/14/94	Alameda County Assessors Office confirmed that the 1180 25th Avenue site (Parcel # 25-707-11-3) is owned by the Oakland Housing Authority.
Cris Nepomuceno	California Environmental Protection Agency (Cal EPA)	(510) 540-3801	01/14/94	Cal EPA has a file on the site. URS arranged to get a copy.
Monica Sterling-Cahee	Regional Water Quality Control Board (RWQCB)	(510) 286-1255	01/14/94	RWQCB has no file on this site.
Barney Chan	Alameda County Environmental Health	(510) 271-4530	01/20/94	See Contact Report.
Robert Shaw	HUD	(415) 556-6642	01/26/94	See Contact Report.
Leroy Moore	Oakland Housing Authority	(510) 535-3150	01/27/94	See Contact Report.

Contact Log cont.

Facility Name: Oakland Housing Authority

Facility ID#: CA7860090045

Contact	Affiliation	Phone #	Date	Information
David Clawson	Oakland Housing Authority	(510) 535-3142	01/28/94	See Contact Report.
Jim Levy	Oakland Housing Authority	(510) 535-3113	02/24/94	See Contact Report.
Roel Meregillano	Alameda County Environmental Health	(510) 271-4320	03/01/94	See Contact Report.
Russ Bowen	East Bay Municipal Utility District (EBMUD)	(510) 287-1830	03/08/94	EBMUD does not use groundwater to supply drinking water in the City of Oakland. There are no surface water intakes in the East Bay.
Robert Joda	HUD	(415) 556-5242	03/21/94	See Contact Report.



Contact Report

Contact Made Concerning: CA7860090045
Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Alameda County

Agency or Affiliation Contact: **Housing and Urban Development (HUD)**
Department: Assisted Housing
Address: 450 Golden Gate Avenue, PO Box 36004
City, State, Zipcode: San Francisco, CA 94102
County: San Francisco

Representative Contact:

Name:	1. Rick Mattessich	2. Robert Shaw	3.
Title:	Pub. Hsing. Divn.	Community Plan.	
Contact Phone Number:	[415] 556-3713	[415] 556-6642	
Contact Date:	01/14/94	01/26/94	
Contact Facsimile Number:			

Contacted by URS Representative: Des Garner

Discussion:

1/14/94: Mr. Mattessich had no knowledge of the property at 25th Avenue, and suggested that Kevin Greene [556-3713] be contacted. He stated that the Oakland Housing Authority (OHA) was a public corporate body, receiving funding from HUD, but operating independently of HUD. There is a contract between HUD and the OHA specifying reporting requirements to account for the spending of federal funds. He did not consider the Oakland Housing Authority a federal entity.

Kevin Green was not available.

1/26/94: Mr. Shaw stated that HUD funds the Oakland Housing Authority, and that if a property is sold or rehabilitated, HUD prepares the required environmental assessment. Volume 24 of the Code of Federal Regulations (24 CFR) Part 50 establishes the level of review required.

End Contact Report

This contact report was sent for confirmation by: ☐ Letter ☐ Phone ☐ Fax ☐ Other _____

This contact report was reviewed by:
(Signature and Date) _____



URS Consultants
Environmental Protection Agency
Site Assessment Program

Contact Report

Contact Made Concerning: CA7860090045
Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Alameda County

Agency or Affiliation Contact: Alameda County Department of Health
Department: Environmental Health
Address: 80 Swan Way, Room 200
City, State, Zipcode: Oakland, CA 94621
County: Alameda

Representative Contact:

Name:	1. Barney Chan	2. Roel Meregillano	3.
Title:	Local Oversight	Inspector	
Contact Phone Number:	[510] 271-4530	[510] 271-4320	
Contact Date:	01/20/94	03/01/94	
Contact Facsimile Number:			

Contacted by URS Representative: Des Garner

Discussion:

1/20/94: Mr. Chan stated that the Alameda County Department of Environmental Health has no record of any underground storage tank (UST) release or UST removal action at the site. Mr. Chan coordinates the local oversight program and referred URS to the General Inspection Program (Amir Gholami, Roel Meregillano) for further information.

3/1/94: Mr. Meregillano stated that Alameda County Environmental Health has no file for the Oakland Housing Authority site at 1180 25th Avenue.

End Contact Report

This contact report was sent for confirmation by: ☐ Letter ☐ Phone ☐ Fax ☐ Other _____

This contact report was reviewed by:
(Signature and Date) _____



Contact Report

Contact Made Concerning: CA7860090045
Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Alameda County

Agency or Affiliation Contact: **Oakland Housing Authority**
Department: Modernization
Address: 1180 25th Avenue
City, State, Zipcode: Oakland, CA 94601
County: Alameda

Representative Contact:

Name:	1. Leroy Moore	2. David Clawson	3. Jim Levy
Title:	Dir. Modernization	Operations Mgr.	Materials Mgmt.
Contact Phone Number:	[510] 535-3150	[510] 535-3142	[510] 535-3113
Contact Date:	01/27/94	01/28/94	02/24/94
Contact Facsimile Number:			

Contacted by URS Representative: Des Garner

Discussion:

Left Messages for Mr. Moore: 01/14/94; 01/20/94; 01/24/94.

1/27/94: Mr. Moore stated that the 1180 25th Avenue facility consists of administrative services with a small maintenance shop. Approximately 100 people work at the facility. The modernization department moved to the 25th Avenue facility about 2 months ago.

Mr. Moore stated that the Department of Housing and Urban Development (HUD) provides funding to the Oakland Housing Authority (OHA). The OHA is entirely separate from the city of Oakland; OHA has reporting requirements to HUD in terms of accounting for funds spent. The mayor of Oakland appoints the OHA board, but the OHA has no reporting obligation to the city of Oakland.

George Elliott is the director of maintenance. David Clawson is the Operations Manager.

1/28/94: Mr. Clawson stated that there is a small maintenance department at the facility that undertakes engine repair. It generates waste oil, which is bulked in a 55-gallon drum for collection by Evergreen Environmental Services of Newark, California. Small quantities of solvents associated with engine component cleaning are also generated. Small quantities of paint are also stored at the facility. Mr. Clawson did not have any information regarding quantities of materials stored or disposal methods, but he suggested that URS speak to James Levy (Materials Management) for this information. There are no underground or above ground fuel tanks on-site.

2/24/94: Mr. Levy stated that the facility is not a federal facility; the OHA is funded mainly by rents collected from its properties and partly by HUD. He was able to reference the original 1981 Hazardous Waste Notification and stated that it corresponded to the shipment of three drums of Malathion to Kettleman Hills for disposal. This occurred once. The notification form was incorrectly marked "F" for federal facility, according to Mr. Levy.

Discussion, continued:

The facility routinely generates waste motor oil and paint thinners. The oil is recycled by Evergreen Environmental Services, of Newark, California; the paint thinners are disposed of by Romic Environmental Technologies, of Palo Alto, California. Occasionally polychlorinated biphenyls (PCBs) and asbestos are disposed of when public housing units are renovated. These are disposed of against site-specific generator numbers, and are not stored at the 1180 25th Avenue facility. Mr. Levy has approximately 3 inches of files, including manifests, etc. and invited URS to visit the facility to inspect the records.

This contact report was sent for confirmation by: ☐ Letter ☐ Phone ☐ Fax ☐ Other _____

This contact report was reviewed by:
(Signature and Date) _____



Contact Report

Contact Made Concerning: CAD7860090045
Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Alameda County

Agency or Affiliation Contact: **Housing and Urban Development (HUD)**
Department: Economic Development
Address: 450 Golden Gate Avenue, PO Box 36004
City, State, Zipcode: San Francisco, CA 94102
County: San Francisco

Representative Contact:
Name: 1. Robert Joda 2. 3.
Title: Market Analyst
Contact Phone Number: (415) 556-5242
Contact Date: 03/21/94
Contact Facsimile Number:

Contacted by URS Representative: Des Garner

Discussion:

Mr. Joda was contacted to further investigate the relationship between HUD and the Oakland Housing Authority (OHA). HUD provides funding to the OHA (Mr. Joda did not know the percentage) in addition to the revenues generated by the OHA from rents. In addition, the OHA also acts as a conduit for HUD subsidies to qualifying citizens. There are a series of separate agreements between HUD and the OHA. The Mayor of Oakland appoints the board of the Oakland Housing Authority, but the Authority is a separate public corporate body.

URS inquired about the relationship between HUD and the other California Housing Authorities (City of LA, Kings County, San Mateo County, and Monterey County). These housing authorities are all listed in the Resource Conservation and Recovery Information System as either large or small quantity generators. Mr. Joda stated that these housing authorities had the same relationship with HUD as did the Oakland Housing Authority: They receive funding, but they are autonomous public corporations.

End Contact Report

This contact report was sent for confirmation by: ☐ Letter ☐ Phone ☐ Fax ☐ Other _____

This contact report was reviewed by:
(Signature and Date) _____

Appendix B
Site Reconnaissance Interview and Observations Report

Site Reconnaissance

Interview and Observation Report

Site Information CA7860090045

Name: **Oakland Housing Authority**
Address: 1180 25th Avenue
City, State, Zip Code: Oakland, CA 94601
Phone Number: (510) 535-3113
Contact Name: Jim Levy
Date of Site Visit: 03/03/94
URS Site Visit Team: Des Garner

Site Representatives

Name : Jim Levy Title Materials Manager

Comments and Observations

The Oakland Housing Authority facility at 1180 25th Avenue consists of a rectangular office and maintenance building, approximately 25,000 square feet in size, and an adjoining paved, fenced storage yard. The facility is located in an industrial/residential area of Oakland, approximately 0.4 miles from the Alameda Harbor, and has been located at this site since 1972. The site is bordered to the west by Southern Pacific Railroad tracks, and to the east by East 12th Street. Approximately 125 people report for work at the facility; more than half of these workers collect their trucks and supplies and work off-site at various Oakland Housing Authority (OHA) properties. These personnel are painters, grounds keepers, maintenance workers, etc. In addition, approximately 48 personnel work on-site. These personnel are administrative staff, carpenters, and other maintenance personnel.

The facility consists of a large indoor parking area where the housing authority trucks are stored, a carpentry shop, a glazing shop, a plumbing shop, and office space. Waste oil generated from the lawn mowers used by the grounds keepers is stored in a 55-gallon drum in the fenced yard adjoining the facility. Approximately 55 gallons of waste oil is generated each year for recycling by Evergreen Environmental Services, of Newark, California. All vehicle maintenance is conducted off-site, so that no waste motor oil or automobile fluids are generated. There are no underground or above ground fuel tanks currently at the facility, nor have there ever been.

In addition to the waste oil generated from the lawn mowers, waste paint thinner/lacquer is also generated. Painting crews return to the facility with waste lacquer, which is bulked in 55-gallon drums in the fenced yard adjoining the facility. During 1993 1.3 tons of waste lacquer (approximately seven drums) was generated, all of which was disposed of at the Romic Environmental Technologies, Inc. facility in Palo Alto. During the URS visit, 1.5 drums of waste lacquer were stored on-site. Both the waste oil and paint lacquer are stored in 55-gallon drums on pallets; however, the pallets are located in an unpaved yard with no

**Site Reconnaissance
Interview and Observation Report
(Continued)**

Comments and Observations (continued)

03/03/94

secondary containment. Mr. Levy said that the original Notification of Hazardous Waste Activity (April 16, 1981) referred to the disposal of three 55-gallon drums of malathion, which were shipped to the Chemical Waste Management facility at Kettleman Hills for disposal. The origin of these drums is not known, but the facility does not use pesticides or herbicides during its routine operations.

Manifests inspected at the facility revealed the following shipments of waste paint lacquer/thinner:

January - December 1990: 500 pounds

January - June 1991: 0

July - December 1991: 500 pounds

January - June 1993: 0.4 tons

July - December 1993: 0.9 tons

January - February 28 1994: 0.4 tons

Waste oil shipments typically averaged one drum per annum; one drum was shipped in February 1994, representing material accumulated since the middle of the previous year.

In addition to the waste generated by maintenance operations run from the 1190 25th Avenue facility, the Oakland Housing Authority also generates asbestos and polychlorinated biphenyl (PCB) transformer waste during the refurbishment of public housing units. These wastes are manifested under separate generator numbers, corresponding either to the facility of origin, or to the main offices of the Oakland Housing Authority at 1619 Harrison Street. Typical waste shipments are as follows:

March 1992: Eight transformers containing PCBs - Chemical Waste management at Kettleman Hills, CA. (Disposed of under EPA Generator # CAC981388952: Oakland Housing Authority, 1619 Harrison Street, Oakland, CA 94612.)

October 1993: One 55-gallon drum of transformer oil containing PCBs - Chemical Waste Management, Kettleman Hills, CA. (Disposed of under EPA Generator # CAC000845600: Oakland Housing Authority, 1619 Harrison Street, Oakland, CA 94612.)

November 1993: 182 bags of asbestos debris - California Asbestos Monofill, Copperopolis, CA. (Disposed of under EPA Generator # CAC981388952: Oakland Housing Authority, 1619 Harrison Street, Oakland, CA 94612.)

January 1994: 120 bags of asbestos debris, generated during the Palovista Gardens renovation - California Asbestos Monofill, Copperopolis, CA. (Disposed of under EPA Generator # CAC981388952: Oakland Housing Authority, 1619 Harrison Street, Oakland, CA 94612.)

**Site Reconnaissance
Interview and Observation Report
(Continued)**

Comments and Observations (continued)

03/03/94

None of this material is stored at or passes through the 25th Avenue facility. (None of these generator numbers could subsequently be traced by URS through either the Resource Conservation and Recovery Information System or the Comprehensive Environmental Response, Compensation, and Liability Information System.)

Mr. Levy maintains a Weekly Inspection Log detailing the quantities of containerized waste stored on-site. The current log lists one drum of waste oil, and one and a half drums of waste lacquer, as was confirmed by the URS inspection of the storage yard.

Mr. Levy stated that the Oakland Housing Authority is a public corporation, separate from the city of Oakland. OHA receives some funding from the Department of Housing and Urban Development (HUD) and generates income from rents derived from its properties. HUD does not own or operate any of the Oakland Housing Authority properties. Mr. Levy does not believe that the OHA is a federal facility. He believes that the federal box was incorrectly checked on the Notification of Hazardous Waste Activity form submitted to the EPA in 1981. URS stated that it would pursue this issue further with HUD to assist EPA in making a determination of the facility's status.

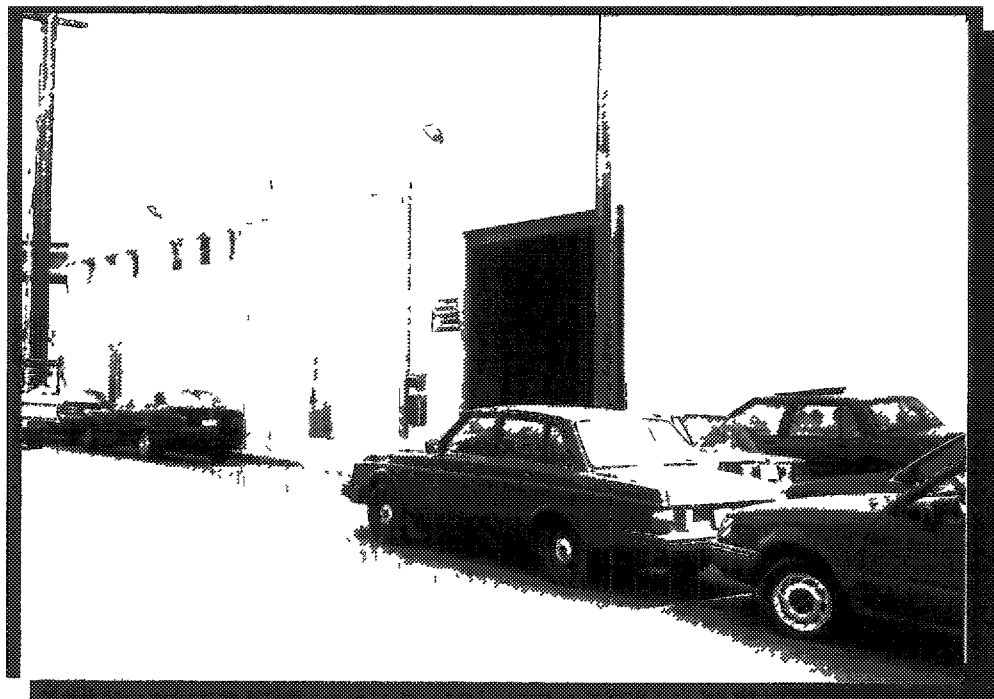
Appendix C
Photo Log

FIELD PHOTOGRAPHY LOG SHEET

CA7860090045
Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 1
Date Taken: 03/03/94
Time Taken: 1130
Direction: East
Weather: Clear
Photographer: DAG



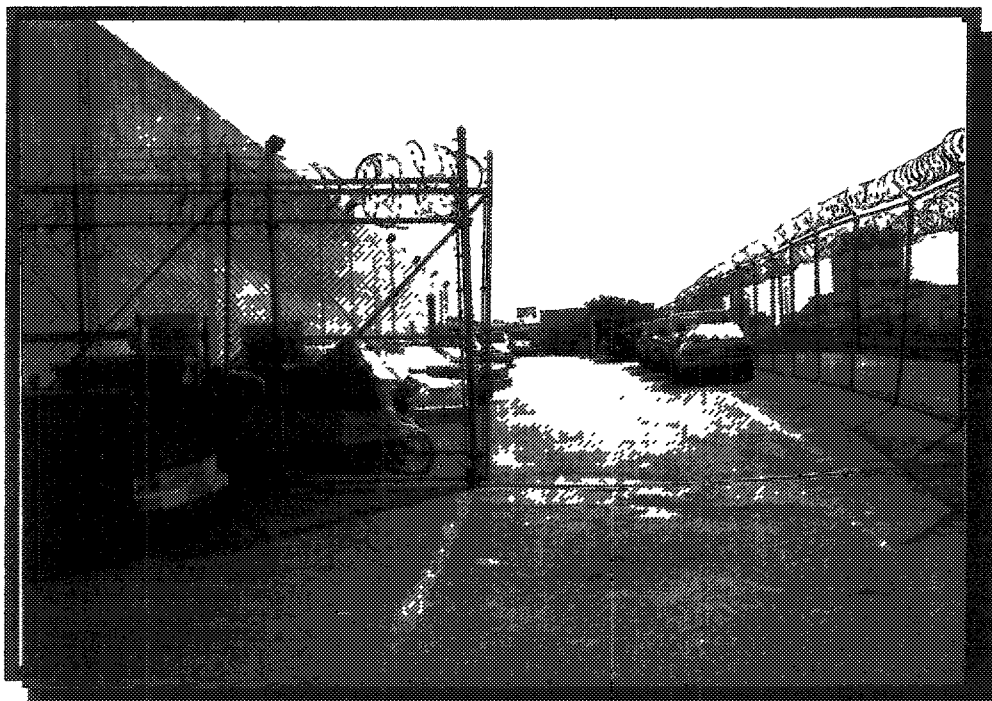
Photograph

Description: Front gate and side of the facility, viewed from 25th Avenue.

CA7860090045
Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 2
Date Taken: 03/03/94
Time Taken: 1130
Direction: Southeast
Weather: Clear
Photographer: DAG



Photograph

Description: The fenced, paved yard adjoining the facility. The drums of waste paint thinner and oil are stored at the rear of this yard, on pallets.

FIELD PHOTOGRAPHY LOG SHEET

CA7860090045

Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 3
Date Taken: 03/03/94
Time Taken: 1100
Direction: South
Weather: N/A
Photographer: DAG



*Photograph
Description:*

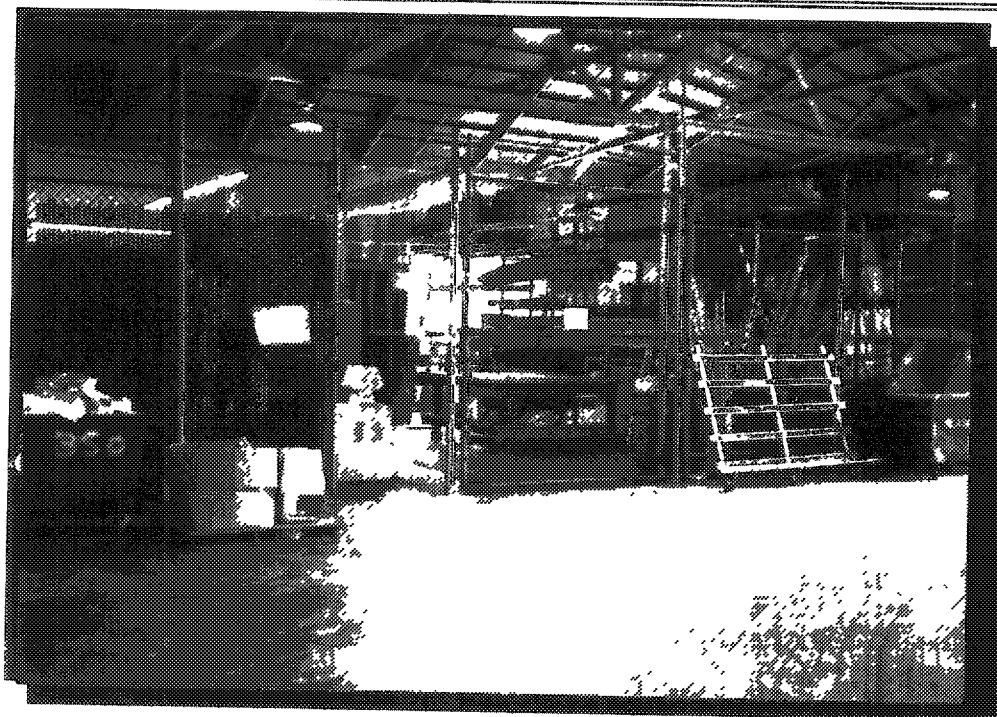
Interior of the facility, showing parked Oakland Housing Authority trucks. The building materials storage area is visible in the background.

CA7860090045

Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 4
Date Taken: 03/03/94
Time Taken: 1100
Direction: Southeast
Weather: N/A
Photographer: DAG



*Photograph
Description:*

Glazing workshop at the rear of the facility.

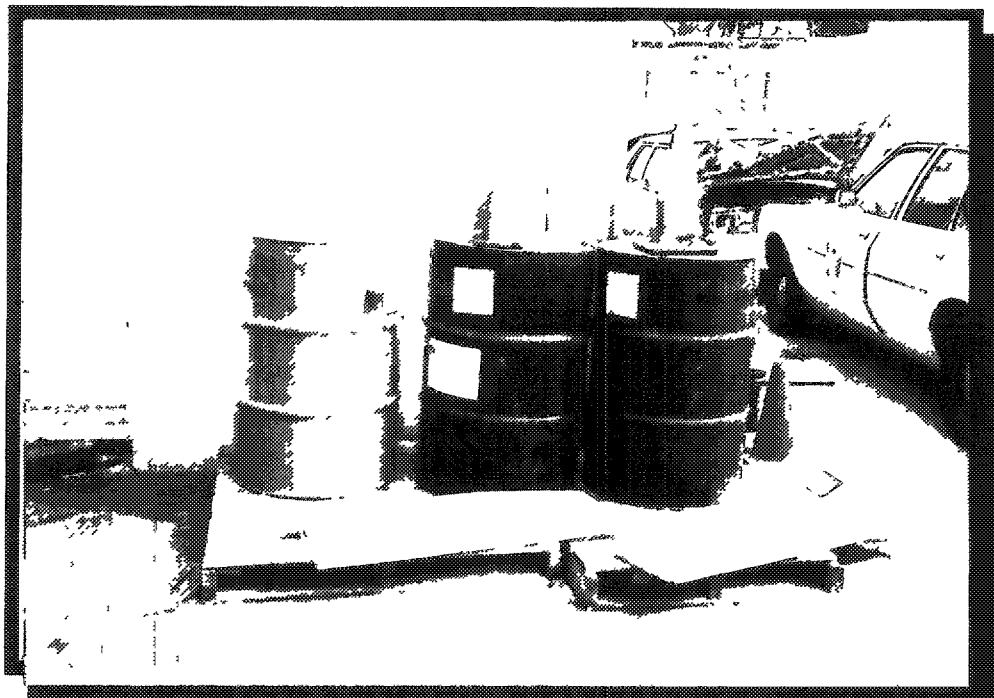
FIELD PHOTOGRAPHY LOG SHEET

CA7860090045

Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 5
Date Taken: 03/03/94
Time Taken: 1115
Direction: Northeast
Weather: Clear
Photographer: DAG



Photograph

Description: Two 55-gallon drums containing waste paint thinners; one empty 55-gallon drum. Drums are on pallets in the fenced, paved yard. However, there is no secondary containment.

CA7860090045

Oakland Housing
1180 25th Avenue
Oakland, CA 94601
Alameda County

Photo

Number: 6
Date Taken: 03/03/94
Time Taken: 1115
Direction: Southeast
Weather: Clear
Photographer: DAG



Photograph

Description: Waste oil drum and empty drums on pallets in the fenced storage yard. The Southern Pacific railroad tracks can be seen in the background.

Appendix D
Latitude/Longitude Worksheet

**LATITUDE AND LONGITUDE CALCULATION WORKSHEET #1
WHEN USING CUSTOM RULER OR COORDINATOR (TM)**

SITE: Oakland Housing Authority NUMBER: CA7860090045
AKA: _____ SSID: _____
ADDRESS: 1180 25th Avenue
CITY: Oakland STATE: CA ZIP CODE: 94601
SITE REFERENCE POINT: 25th Avenue & East 12th Street
TOPO MAP Oakland East TOWNSHIP: 2S RANGE: 3W
SCALE: 1:24,000 MAP DATE: 1959 SECTION: 19 1/4 1/4 1/4 1/4
MAP DATUM: ☒ 1927 ☐ 1983 MERIDIAN: Mount Diablo

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP:

LONGITUDE: 122° 07' 30" LATITUDE: 37° 45' 00"

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5 SUB-MAP:

LONGITUDE: 122° 07' 30" LATITUDE: 37° 47' 30"

CALCULATIONS: LATITUDE (7.5 MINUTE QUADRANGLE MAP)

A) ALIGN THE BOTTOM OF THE SCALE WITH BOTTOM OF GRID. ALIGN THE TOP OF THE SCALE WITH THE TOP OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.

B) READ TICS ON RULER AT 1 OR 0.5 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)

2' 20"

C) RECORD LATITUDE: 37° 47' 20" N

CALCULATIONS: LONGITUDE (7.5 MINUTE QUADRANGLE MAP)

A) ALIGN THE BOTTOM OF THE SCALE WITH THE RIGHT SIDE OF GRID. ALIGN THE TOP OF THE SCALE WITH THE LEFT SIDE OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.

B) READ TICS ON RULER AT 1 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)

6' 05"

C) RECORD LONGITUDE: 122° 13' 35" W

INVESTIGATOR: Des Garner

DATE: 01/14/94

9-90-94 3/4

MEMORANDUM

**To: Jere Johnson, EPA Region IX
Work Assignment Manager**

From: William E. Ritthaler, URS Consultants, Inc. *WR*

**Subject: Transmittal List for Oakland Housing Authority
Preliminary Assessment
EPA ID No.: CA7860090045**

URS suggests that the following persons/agencies receive a copy of the document referenced above:

- Oakland Housing Authority
1180 25th Avenue
Oakland, CA 94601
Attn Jim Levy
- Alameda County Health Department
80 Swan Way
Oakland, CA 94621
Attn: Roel Meregillano

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704

REC'D

02/25/94

US OALAMES
[from DTSC]SURVEILLANCE AND COMPLIANCE REPORT
HAZARDOUS WASTE GENERATOR

Date of Inspection: 4/2/94

EPA I.D. # 1014171816101019101014151

Inspector's Name: W.J. Agnew

Generator Name/Address

Mailing Address

Ownership

CITY OF OAKLAND

HOUSING AUTHORITY

1180 25TH AVE

OAKLAND, CA 94601

1619 HARRISON ST.

OAKLAND, CA 94612

County ALAMEDA

Type of business:

Persons present:

Contact Person PAT TAYLOR (MS)

WAKE SLEEPING

PAT TAYLOR

Phone # (415) 874-1611

Samples taken: Yes ___ (receipt attached) No ☒

Avg. Gen. Rate (monthly): 0

Plan of Correction necessary: Yes ___ (Due date: ___) No ☒

Discussion with Management:

NO HAZARDOUS WASTES HAVE BEEN GENERATED OR SHIPPED
SINCE 1980 WHEN SOME EXCESS PESTICIDES WERE
DISPOSED OF.

NO HAZARDOUS WASTES ARE GENERATED AS PART OF
ANY ONGOING PROCESS OR PROCEDURE

WILL RETAIN REGISTRATION

Document Control No. 635

File No. 41-62311-22

File Code

cc:

Date Received 02/25/94

On this date an inspection of your facility was conducted under authority of Section 25185, California Health & Safety Code and Section 66328, California Administrative Code. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66328, California Administrative Code. The following conditions or practices observed this date are alleged to be violations of one or more sections of the California Health & Safety Code, Division 20, or California Administrative Code, Title 22, relating to the storage, handling, transportation, and disposal of hazardous and extremely hazardous waste or asbestos containing products.

Authorized Representative of Firm*

Name Pat W. Sayp

Title Nat'l's Mgr

Signature Pat W. Sayp

Date

Authorized State Agent

Name W.J. Agnew

Signature W.J. Agnew

Date 4/2/94

*Signature of firm representative signifies receipt of copy of this form

reference #6

GENERATOR COMPLIANCE CHECKLIST

Section #	CITY OF OAKLAND HOUSING AUTHORITY	Compliance			
		Yes	No	N/A	Expl
	<u>MANIFEST</u>				
66470 (a)	All applicable sections accurately and legibly completed			X	
(CAC) (b)	All hazardous waste transported offsite is recorded			X	
66475 (a)	Producer of waste section is completed and signed			X	
(b)	Hazardous wastes accurately described			X	
(c)	Degree of hazard indicated			X	
(d)	Proper D.O.T. shipping name is provided for each load			X	
(e)	Copy of manifest submitted to registered hauler upon transfer			X	
(f)	Volume of waste properly indicated			X	
(g)	Properly completed copies of manifest submitted monthly to DOHS			X	
	<u>LAND DISPOSAL</u>				
66490 (a)	Only at state approved facilities			X	
	<u>INCOMPATIBLE WASTE</u>				
66500 (a)	Contact/mixing of incompatible waste does not occur	X			
(b)	Storage and transportation containers separated and protected			X	
(c)	Wastes are not added to unwashed incompatible container	X			
	<u>OPERATION REQUIREMENTS FOR PRODUCER</u>				
66505(a,b)	Hazardous determination made for all waste			X	
(c)	Hazardous waste taken to state approved facility			X	
	<u>EXTREMELY HAZARDOUS WASTE PERMIT REQUIREMENTS</u>				
66570(a,b)	No extremely hazardous waste is handled or disposed w/o permit	X			
(d)	No deviation from DOHS approved handling and disposal methods	X			
	<u>HAZARDOUS WASTE FACILITY REQUIREMENTS</u>				
25123.3	Does not store onsite hazardous waste for more than 90 days	X			
(H&Scode)	Does not store hazardous waste offsite for more than 96 hours	X			
25201	Does not operate onsite hazardous waste treatment facility	X			
	Does not operate onsite hazardous waste transfer station	X			
	Does not operate onsite haz. wst. resource recovery facility	X			
	Does not operate onsite hazardous waste disposal site	X			
	<u>UNDERGROUND TANKS</u>				
	Does generator have underground tanks containing:				
	Hazardous materials?		X		
	Hazardous wastes?		X		
	Does generator have leak detection system for undergrnd tanks?			X	
25342	HAS ANNUAL REPORT BEEN SUBMITTED TO BD. OF				
H&S	EQUALIZATION?			X	
CODE	WAS A COPY KEPT?			X	

* - Expl - explanation attached